EXECUTIVE SUMMARY

Introduction

At the request of Ohio Realty Advisors (ORA) in Richfield, OH, Mountain Sky Group, LLC (MSG) performed a Phase I Environmental Site Assessment (ESA) in general conformance with the scope and limitations of the ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-05) for the 87 acre Hoover Company site (the Site) in the North Canton, Stark County, Ohio. The Site includes all portions of the Hoover Company facility that is a household vacuum cleaner and steam cleaner manufacturing facility, located at 101 East Maple Street, North Canton, OH. Any exceptions to, or deletions from, this practice are described in Section 1.1.4 of this report. In addition to the ASTM standard requirements that are met by this report, it also addresses several other scope items including:

- Possible radon exposure associated with the Site;
- Possible asbestos sources present at the Site and an analysis of the friability and condition of any asbestos sources;
- Possible presence of Poly-chlorinated Biphenyls (PCB's) in electrical transformers, hydraulic fluids, lighting ballasts and other materials;
- Possible lead paint sources present at the Site and their potential for exposure liability;
- The possibility of lead being present in drinking water, and;
- The possible presence of mold at the Site that could create human health risk.

Figure 1 is a Site location map showing the location of the Site with respect to the general area in Stark County, Ohio. Figures 2 and 3 depict a couple of different variations on a Site Plan showing approximate boundaries of the Site and salient features observed for the Site. Copies of photographs taken during the Site visit are included in Appendix A.

PROPERTY DESCRIPTION

Property Description

The Site consists of approximately 87 total acres of land with approximately 25 acres of manufacturing and warehouse buildings and the remaining 62 acres being outside storage, parking space and outdoor recreation space, in North Canton, OH (Figures 2 and 3). It includes one large warehouse building (Bldg. 36, ~199,100 sq. ft.), one large new manufacturing building complex (Bldgs. 16,17,18,37, ~300,800 sq. ft.), one administrative and office building (Bldg. 11, ~120,000 sq. ft.), one large older manufacturing conglomeration of buildings (Bldgs. 3,4,5,6,7,8,9,10,14, 38, ~450,000 sq. ft.) and a number of smaller support buildings (~55,000 sq. ft.). The Site's operations include plastic injection molding, zinc plating

and phosphating, electric motor manufacturing including varnishing and powder coating, spring manufacturing, detergent based parts washing and degreasing, finishing operations and assembly.

One street address is associated with five (5) parcels and was identified on the Stark County Auditor's web page:

http://www.engineer.co.stark.oh.us/mapmain.asp?toDo=init

The street address is 101 East Maple Street,

The Stark County Auditor's parcel numbers associated with the above addresses are:

- 5608114
- 5608115
- 5608116 – Parcel 5608117 is associated with 5608116 as a continuation of the legal description in the County Auditor's records and is not an additional physical parcel.
- 5608118 – Parcel 5608119 is associated with 5608118 as a continuation of the legal description in the County Auditor's records and is not an additional physical parcel.
- 5608120 – Parcels 5608121 and 5608122 are associated with 5608120 as a continuation of the legal description in the County Auditor's records and are not additional physical parcels.

The Hoover Company Site is bounded to the north by Hoover High School, a city park and residential dwellings; to the south by a YMCA facility and residential dwellings; to the east by Hoover High School's football facility and residential dwellings, and; to the west by North Main Street, commercial buildings (North Canton City Hall and Public Library), a church, and residential dwellings. The approximate latitude and longitude of the center of the Site are 40.878500 – 40 degrees 52'42.6" North and 81.400000 – 81degrees 24'0.0" West.

The northern area of the Site (excepting the athletic practice facility and football parking area) is fenced but not secure. The southern portion of the Site (south of Witwer Street) is fenced in accessible areas and does have secure access entries (key cards and a guard house). Parking areas on the extreme south end of the Site are not fenced and are not secure.

The Site covers several city blocks, and is crossed by multiple public streets which are traversed both overhead and underground with easements for bridge structures and utilities (Pictures in Appendix A). The northern portions of the Site are used by the City of North Canton for baseball fields, a high school football practice field and parking. Covered and uncovered parking for employees and a visitor parking lot are located on the southern end of the property (Figures 2 and 3).

Historical Review

Historical records are abundant and from a number of sources for this Site. Historical use evidence was obtained from aerial photographs, USGS Topographic Maps, a number of public databases (federal, state and county), numerous reports and documents generated about the site environmental status since the late 1980s, and interviews with key Site and government officials.

Prior to 1908 the Site was primarily woodlands and a part of the Hoover family farmstead. In 1908 the Hoover family initiated a saddle manufacturing and tanning activity on a small portion of the Site. Since 1909 the Site has been used exclusively for its current use (vacuum cleaner manufacturing). Over time the site has been expanded as shown in the aerial photographs (Appendix E), and portions of the site (the northern portion primarily) have previously had industrial uses and are now used for storage, parking and recreational purposes.

Other Sources

There are numerous environmental reports and documents associated with the Site. MSG has reviewed some of these, and assessed their relevance in assessing the environmental status of this Site. In 1988 Hoover initiated an environmental review of a drum storage area in the northern portion of the site. As a result of that study, additional environmental review was slowly continued, and in 1999 a comprehensive environmental review was undertaken (Section 3 - References). Several subsequent investigations have focused on the delineation of contaminated groundwater and soils as well as remedy design. Site chemicals of concern that have been identified include: metals, polycylic aromatic hydrocarbons, semi-volatile organic compounds, volatile organic compounds (VOCs), and polychlorinated byphenyls (PCBs).

The planned remedy is contingent upon institutional controls, consisting of land use restrictions, a groundwater use ordinance, and engineering controls. These engineering controls consist of a soils management plan, proper maintenance of building floors and foundations, and the use of vapor barriers for future construction. The remedy has been accepted by the United States Environmental Protection Agency (USEPA) and consists of a long-term operations and maintenance program, monitored natural attenuation of contamination in the groundwater, groundwater monitoring, and maintenance of institutional and engineering controls.

Regulatory Review

For the purposes of the regulatory database search, 101 East Maple Street, North Canton, OH, 44720 was the site address used. Regulatory database sites identified within applicable search radii of the site listed within the Environmental Data Sources (EDR) Radius Map with GeoCheck® (EDR Report) were reviewed. These regulatory databases did not reveal the presence of any concerns or RECs on the Site other than the groundwater REC that is discussed in the previous Section. No adjacent or surrounding sites are deemed to pose an environmental risk for the Site.

Sites listed as "orphan" sites were reviewed and seven (7) orphan sites were identified in the EDR Report. Further information on orphan sites is provided in the EDR Report. None of the orphan sites pose a REC to the site, and are discussed in section 1.4.1.2.

Non ASTM Related issues interpretative Assessment

- Floodplains: Based on a review of Federal Emergency Management Agency electronic data provided in the EDR Report, the site is not located in 500-year and 100-year flood plains. This does not constitute an on-site concern.
- Asbestos: Based on a limited Asbestos Survey conducted by American Analytical laboratories in 2000, there are materials present on the Site that could pose an on-site concern. Visible suspect asbestos containing material (ACM) was also observed during the MSG site visits. Most of the materials of concern involve non-friable floor tile, and encapsulated drywall mud and taping material that pose no environmental risks to building occupants or visitors. Hoover has historically had a small amount of ACM removal and according to records reviewed has used appropriate environmental protective measures for removal and disposal. There is an Operations and Maintenance Plan in effect for asbestos, and according to Site personnel it has been followed since its 2000 inception. Because of the pending sale of the Site, and the possibility of considerable renovation of the Site buildings, the substantial asbestos presence is deemed to be an environmental concern.
- Lead-Based Paint: The structures that exist at the Site were for the most part constructed prior to 1978. Based on the age of these structures, there is a potential for lead-based paint to exist which constitutes an on-site concern; however, no visible flaking and deteriorating suspect lead-based paint was observed during the site visits.
- Mold: There have not historically been any suspicions of mold issues regarding the Site. Site personnel have no recollection of any prior employee complaints or any observations of mold related issues at the Site. During the MSG site inspections, no observations of any mold issues were made
- Radon: The site is located in Stark County, Ohio which is in a U.S. Environmental Protection Agency (EPA) Radon Zone 1, an area of the highest radon exposure potential, having potential indoor average radon levels of more than 4 Pico Curries per liter (pCi/L), greater than the residential action level. This does constitute a concern, but not a REC.
- Sensitive Receptors: There are no sensitive receptors (drinking water wells, residences, wetlands, surface water, endangered species, etc.) that are being negatively impacted by any on-site or off-site environmental conditions.

Conclusions and Recommendations

Mountain Sky Group, LLC, performed a Phase I ESA in general conformance with the scope and limitations of ASTM E1527-05 for the Site. The Site is identified with one street address (it is comprised of five parcels) and exists in the downtown area of North Canton on the east side of N. Main Street. The site is situated on approximately 87 acres of land, with almost 62 acres being parking, storage or recreation areas. The approximate latitude and longitude of the center of the site are 40.878500 – 40 degrees 52'42.6" North and 81.400000 – 81degrees 24'0.0" West. The site can be accessed only from a

number of entries off surrounding streets from the Site, and consists of commercial property operated primarily as a household vacuum cleaner and steam cleaner manufacturing facility.

The objective of this assessment was to identify any RECs in connection with the property including the presence, or likely presence, of any hazardous substances or petroleum products on the site under conditions that indicate an existing release, a past release, or a material threat of a release into structures on the site or into the ground, groundwater, or surface water. This assessment included an evaluation to the extent practicable of the past and present land uses at the site and on adjacent properties. Mountain Sky Group performed a property and surrounding area reconnaissance to identify obvious indications of present or past activities that have or could have contaminated the property. A detailed assessment of issues identified as 'additional issues' in ASTM E 1527-05 such as floodplains, wetlands, asbestos, lead based paint, PCB's, radon, and mold conditions, were performed as part of this assessment.

This assessment revealed evidence of one (1) on-site REC, no off-site REC's, five (5) on-site concerns, and no off-site concerns. The REC's and concerns are discussed in the following paragraphs.

On-Site RECs

The groundwater underlying a portion of the Site is known to be contaminated with chlorinated hydrocarbons. Risk assessments have indicated that the contamination does not pose a risk to human health or the environment. The USEPA has determined that no further remedial action is required and that the plume can be controlled by natural attenuation. Also, the safety of on-site occupants can be protected through the implementation of Land Use Controls (Section 1.4.4.8).

MSG is concerned that the USEPA and State of Ohio EPA will look differently at this situation once a new owner and/or new use is contemplated. Also MSG is concerned about future issues regarding tort liability from the adjoining property owners whose sites are under laid by a groundwater plume emanating from the Hoover Site. Therefore, MSG considers this groundwater issue to be a REC for the Site.

Off-Site REC

There were no off-site RECs identified by this assessment.

On-Site Concerns

- ACM present primarily in floor tile, mastic, dry wall mud, thermal insulation, transite counter tops, roofing materials and window caulking. A limited survey conducted in 2000 has identified the possible ACM present throughout the Site. This survey and MSGs visual inspection has confirmed that the ACM is in good condition and should not pose a considerable risk if managed properly.
- Lead-based paint is likely to be present in a number of locations throughout the buildings at the Site. Like ACM the painted surfaces are in good condition and should not pose a substantial risk if managed properly.

- Radon in indoor air. Because Stark County has been determined to be in EPA's Zone 1 having the highest potential for indoor exposure to elevated radon levels, radon is a concern inside buildings on the Site. Especially if any of the buildings on the Site were to be converted to a residential use, radon exposure is a concern.
- The 10,000 gallon abandoned fuel oil tank located in the parking lot south of the boiler building (Bldg. 2) has been tightness tested and has passed. There are no known soil or groundwater conditions associated with the tank, but there is suspicion that there is still residual liquid in the tank. Due to this uncertainty, MSG believes this tank constitutes and environmental concern for the Site.
- The Site has had almost 100 years of manufacturing using chemicals containing chlorinated hydrocarbons, metals and other hazardous chemicals. There are sumps and floor channels and many places where chemical spillage could accumulate and not be noticed. There has never been any sampling of the manufacturing floor surfaces or of the soil underlying them. Because of the long history of chemical use and because it is likely that the floor surface may be disturbed in a future renovation or demolition, MSG believes that the possible contamination of building materials in the floor and the soil underneath it constitutes an environmental concern.

Off-Site Concerns

There were no off-site concerns revealed in this assessment.

Executive Summary Limitations

This Executive Summary is presented for convenience only. While the Executive Summary is an integral part of the report, it should not be used in lieu of reading the entire report, including the appendices.

Following this Executive Summary, Section 1.0 provides the Phase I ESA report on the site. Section 2.0 provides the signatures of the environmental professionals that prepared this report. Section 3.0 provides the references used to prepare this report. Documentation for the activities described herein is provided in the Appendices.

1.0 PHASE I ESA REPORT

1.1 INTRODUCTION

Ohio Realty Advisors (ORA) of Richfield, Ohio requested that Mountain Sky Group, LLC (MSG) perform this Phase I Environmental Site Assessment (ESA) for the 87 acre of the Hoover Company facility (the Site) located in North Canton, Stark County, Ohio. This section presents the findings of a Phase I ESA of the site. MSG performed this Phase I ESA in accordance with the terms of the proposal and Professional Service Agreement between ORA and MSG dated July, 2007. The Phase I ESA services performed include information obtained from: 1) reviewable records which include historic aerial photographs, historic topographic maps, historic reports and documents, and governmental databases; 2) the site reconnaissance performed on July 10, 2007 and August 27, 2007, and; 3) interviews with local government officials, the Site owner, and Site occupants.

1.1.1 Purpose

Pursuant to ASTM International (ASTM) Standard E 1527-05, the purpose of the ESA is to identify *recognized environmental conditions* (RECs) associated with the property. The term REC is defined as the presence or likely presence of any *hazardous substances* or *petroleum products* on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term REC is not intended to include *de minimis* conditions that generally do not represent a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not RECs.

MSG's professional opinion regarding the presence or absence of RECs is based on information obtained during site reconnaissance and from other activities as described herein. Dr. Wayne Dorband and Mr. Terry Romero of MSG performed a site investigation on July 10, 2007. Dr. Dorband conducted a second site investigation on August 27, 2007. Dr. Dorband is the founder, President and CEO of MSG with an Associates of Arts (A.A.) in Liberal Arts, Bachelor of Science (B.S.) in Biology, Master of Science (M.S.) in Ecology, Doctorate of Philosophy (PhD) in Aquatic Ecology and over thirty (30) years of experience in conducting assessments. Mr. Romero has 4 years of experience working on environmental projects. Dr. Dorband wrote this assessment and Mr. Romero reviewed the report. Dr. Dorband's bio is provided in Appendix B.

1.1.2 Detailed Scope-of-Services

ORA authorized MSG to conduct this ESA in July, 2007. As part of this ESA, MSG performed ESA activities in general conformance with the standards of care recommended by ASTM Standard E 1527-05, including:

- Reviewed operations, chemical handling, waste management systems, and prior waste handling practices at the site based solely on current visual observations. Also discussed (with property management) complaints, legal proceedings, and violations related to

environmental issues in which the site may have been involved, as well as specific environmental management policies and communications with regulatory agencies.

- Reviewed parts of several bankers boxes of reports and documents that describe historical environmental reviews and conditions associated with the Site and surrounding sites.
- Visually inspected the site and grounds and interviewed key personnel. These interviews and the property inspection were conducted to identify past or current materials and operating practices that could result in environmental liabilities or noncompliance issues under various local, state and federal environmental statutes. Except as described in this report, MSG did not independently verify information obtained during interviews and records reviews.
- Obtained and reviewed ascertainable information provided in a review of publicly available historical and governmental records.

1.1.3 Significant Assumptions

In conducting the ESA, MSG made the assumptions below:

- Site representative(s) were knowledgeable about the site and its history, would be available for interview(s), and would provide access as necessary to complete the scope of work.
- MSG would have the timely, unrestricted access necessary to complete the scope of work.
- Historic documents describing conditions on the Site and affecting the Site are accurate.
- Environmental professionals currently working on the Site have reliable and accurate knowledge regarding the conditions on the Site.

1.1.4 Limitations and Exceptions

Lack of evidence of the presence of RECs (by definition to include presence of hazardous substances and petroleum products) following completion of the scope of work does not guarantee the absence of such conditions; rather, it indicates only that none were identified as a result of the services provided. The limited scope of work precludes MSG from providing a warranty or guarantee regarding the presence or absence of hazardous materials that could potentially affect the property. MSG has provided its best professional opinion regarding presence of RECs and performed the practices and procedures generally accepted in the environmental and engineering consulting fields.

This ESA does not include a MSG conducted radon survey, lead paint sampling, or wetland delineation. It does include results and conclusions from a limited asbestos survey and a PCB in electrical transformers report. MSG has attempted to ascertain but does not guarantee the authenticity or reliability of the information it has received from outside sources.

Mr. Dave Judkins of Hoover Company (Hoover) provided access to areas throughout the Site and answered questions about the history and operations of the Site. The Site inspections were performed with full cooperation from Site personnel.

1.1.5 Special Terms and Conditions

This report is intended to provide a complete disclosure and collective record of facts and findings discovered in the process of performing this Phase I ESA. This report is not a comprehensive site characterization and should not be construed as such. This report presents opinions that are based on the findings of visually observable on-site and off-site conditions, a review of specific regulatory records and historical sources, and information obtained during interviews of persons responsible for or knowledgeable about the site. MSG's professional opinions are based on limited data. No other warranty is given or implied by this report.

MSG has endeavored to meet the applicable standard of care and in so doing, is advising ORA of the ESA limitations. MSG believes this information is essential to identify and manage risks. These risks can be reduced, but cannot be completely eliminated through additional research. Where additional research is warranted based on the results of this Phase I ESA, MSG has highlighted the relevant issues herein.

1.1.6 Reliance

This report was prepared for the sole use of Ohio Realty Advisors (ORA), and their respective agents, representatives, successors and assigns. ORA has also advised that their prospective financial partners (yet to be identified) will also be able to use this report to assist them in making financing decisions. No other party should rely on the information contained herein without prior written consent of MSG and ORA. With the consent of ORA, MSG is available to work with other parties in developing probability estimates, given other parties' unique risk management concerns.

Reliance on this report by parties other than ORA may result in reliance on assumptions whose extent and nature could distort the meaning and impact of the estimates given in this report. This could result in misinterpretation of these estimates and unwise actions based on those misinterpretations. As such, no party, except ORA or its designated financial partners, should rely upon estimates for the potential of hazardous materials to exist at the subject site. The guidelines used to define hazardous substances and petroleum products were obtained from the ASTM Standard of Practice E 1527-05.

1.2 SITE DESCRIPTION

Descriptions of the site location, improvements, current uses, and utilities are presented in the sections below. Site photographs are provided in Appendix A.

1.2.1 Location and Legal Description

The Hoover Company Site is bounded to the north by Hoover High School, a city park and residential dwellings; to the south by a YMCA facility and residential dwellings; to the east by Hoover High School's football facility and residential dwellings, and; to the west by North Main Street, commercial buildings (North Canton City Hall and Public Library), a church, and residential dwellings. The

approximate latitude and longitude of the center of the Site are 40.878500 – 40 degrees 52'42.6" North and 81.400000 – 81degrees 24'0.0" West. The northern area of the Site (excepting the athletic practice facility and football parking area) is fenced but not secure. The southern portion of the Site (south of Witwer Street) is fenced in accessible areas and does have secure access entries (key cards and a guard house). Parking areas on the extreme south end of the Site are not fenced and are not secure.

The Site covers several city blocks, and is crossed by multiple public streets which are traversed both overhead and underground with easements for bridge structures and utilities (Appendix A). The northern portions of the Site are used by the City of North Canton for baseball fields, a high school football practice field and parking. Covered and uncovered parking for employees and a visitor parking lot are located on the southern end of the property (Figures 2 and 3).

The Site is identified by a single site address. The site consists of five (5) parcels and is situated on approximately 87 paved acres in the City of North Canton, Stark County, Ohio.

The site consists almost entirely as a manufacturing facility for the Hoover Company. The Site consists of approximately 87 total acres of land with approximately 25 acres of manufacturing and warehouse buildings and the remaining 62 acres being outside storage, parking space and outdoor recreation space. There is one small residential dwelling on the Site that is leased to an unidentified third party (Figures 2 and 3). MSG was not able to access this small dwelling during its site inspections. It was the only building or space that was not accessible to MSG. There is no reason to believe that this residential structure poses an environmental threat to the Site.

The location of the site is shown on the United States Geological Survey (USGS) Topographic Map, North Canton, dated 1994 shown on Figure 1. Figures 2 and 3 are Site Layout Maps showing the layout of the Site and surrounding properties, in a variety of different views and depictions.

1.2.2 Site and Vicinity General Characteristics

As described previously, the Site totals approximately 87 acres, and consists of primarily (62 acres) of parking, storage and recreational use space (Figures 2 and 3). Approximately 25 acres (~1,218,000 sq. ft.) is covered by buildings that are used as offices, warehouses, manufacturing facilities and support buildings. These buildings are dominated by the large warehouse building (Bldg. 36, ~199,100 sq. ft.) on the north side of the Site, an interconnected large new manufacturing building complex (Bldgs. 16,17,18,37, ~300,800 sq. ft.), one administrative and office building (Bldg. 11, ~120,000 sq. ft.), one large older manufacturing conglomeration of buildings (Bldgs. 3,4,5,6,7,8,9,10,14, 38, ~450,000 sq. ft.) and a number of smaller support buildings (~55,000 sq. ft.). Currently most of the buildings are being phased out of the manufacturing process as the facility is being prepared for abandonment by Hoover.

The northern area of the site (excluding the ball fields and parking area) is surrounded by a non-secure chain link fence. The central area of the Site is almost entirely parking and is not fenced or secure (bordered by Hower Street on the north and Witwer Street on the south). The manufacturing portion of the Site (bordered by North Main Street on the west, Witwer Street on the north, Taft Street on the east and East Maple Street on the south) is either securely fenced or is the sides of buildings. It has minimal entry access through guarded or key card entries.

The approximate location of the site is shown on the Site Vicinity Map (Figure 1). The site is relatively flat with minimal slope. The general layout of the site and the location of items of interest related to adjoining properties are shown on Figures 2 - 3.

1.2.3 Current Uses of Site

As described in earlier sections, the primary use for the Site involves all of those activities involved in the manufacturing of household vacuum cleaners and steam cleaners. As Site representative Mr. David Judkins told MSG, at one time the Site made every part of a vacuum cleaner – "down to the screws".

The facility's operations include plastic injection molding, zinc plating and phosphating, electric motor manufacturing including varnish and powder coating, spring manufacturing, detergent based parts washing and degreasing, finishing operations, and assembly. The Hoover Company operates under the standard industrial classification (SIC) code of 3635, which is specific to establishments primarily engaged in manufacturing vacuum cleaners for household use. This SIC code corresponds to North American Industry Classification System code 335212.

Again, large portions of the Site are used for employee parking and are paved lots (approx. 30 acres). At the far northern end of the Site, approximately 30 acres is currently used by the City of North Canton as public baseball fields. Adjacent to the ball fields on the east is a gravel covered parking lot used for parking for the Hoover High School football stadium during events, and a football practice field used by Hoover High School.

Also at the northern end of the site is an approximately 5 acre area that is used for industrial water treatment for the Site (See Section 1.5.3.10 for further description). Another area on the north is a non-paved trailer parking area.

1.2.4 Description of Structures, Roads, and Other Improvements on the Site

As mentioned previously approximately 25 acres (~1,218,000 sq. ft.) of the Site is covered by buildings. The Site is owned by The Hoover Company. The Hoover Company has been owned by TTI since early in 2007. TTI bought the company from Whirlpool Corporation who had bought it as a part of their Maytag acquisition in April 2006. The subject property contains numerous site buildings containing office space, utility rooms, and a variety of manufacturing facilities. A number of the buildings are interconnected and operate essentially as single buildings.

Table 1 provides a detailed list of all the buildings on the Site with their ages, size, and current use. Appendix A provides photographs of a number of the buildings and the site in general.

Table 1
Hoover Company Facility Building Inventory

Bldg. #	Date Built	Function	Approximate Footprint SF	Status
2	1920	power plant, and aluminum refinishing	3,600	In use
2C	1963	addition to Building 2 power plant		In use
3	1916, 1917	3-story structure with wastewater treatment pit used for manufacturing	12,500	In Use
4	1919	4-story structure used for manufacturing	19,400	In Use
5	1929	4-story structure used for manufacturing	26,500	In Use
5B	1937, 1944	4-story structure used for manufacturing	9,600	In Use
6	1929	1-story structure with basement testing laboratory	11,900	In Use
7	Unknown	1-story structure formerly contained PCB containing transformers	2,100	In Use
8	1924	1-story structure used for manufacturing	19,400	In-Use
8B	1936	1-story structure used for manufacturing	6,800	In-Use
8C	1934	3-story structure used for manufacturing	13,300	In-Use
9	1937	2-story structure used for painting. washing, varnishing, and assembly	17,000	In-Use
9A	1940	4-story structure used for manufacturing	Included with Bldg. 9	In-Use
9B	1940	1-story structure used for manufacturing	Included with Bldg. 9	In-Use
10	1924	4-story structure used for for manufacturing and engineering	18,700	In-Use
11	1968	4-story structure used for office space	29,000	Vacant
13	Unknown	1-story structure used for oil storage	NA	Unknown
14	1948	1-story structure used. for production line	8,200	In-Use
15	1969	1-story structure used for manufacturing	12,700	In-Use
16	1967	1-story structure used for manufacturing	86,600	In-Use
17	1958	1-story structure used for manufacturing	41,000	In-Use
18	1963	2 story structure used for manufacturing	123,700	In-Use
30	Unknown	Maintenance Building	20,600	In-Use

32	Unknown	Storage	1,600	In-Use
35	Unknown	Chemical and Waste Storage Building	33,800	In-Use
36	Unknown	Warehouse	199,100	In-Use
37	1961	1-story structure used for manufacturing	47,500	In-Use
38	1963	1-story structure used as a corridor between Buildings 9, 9A, and 10, and for manufacturing	17,900	In-Use
		Total building footprint	**782,500**	**Square Feet**

As described previously there are a number of roads that run through the Site. For the most part these are public roads and they include East Maple Street, Witwer Street, Hower Street, Charlotte Street, Orchard Ave., Park Ave. and McKinley Street. There is an overhead enclosed and heated bridge that connects the manufacturing buildings (Bldgs. 16,17,18 and 37) and the warehouse building (Bldg. 36).

The site is underlain by a number of utility tunnels that primarily initiate at the old boiler building (Bldg. 2) and supply heat, water and power to areas of the buildings. The buildings are of various construction types, materials, heights, and sizes. The main office building (Building 11) is currently vacant and is directly connected to the manufacturing buildings by a connector building.

1.2.5 Current Uses of Adjoining Properties

Recreational, commercial, and residential properties currently surround the Site. The following sections describe the current uses of properties adjacent to the site to the north, south, east, and west (Figures 2 and 3).

- North – the Site is bound by 7th Street at the eastern end. Across the street from 7th Street is Hoover High School and a City Park with a swimming pool and a skate park adjacent to the street. Along the western end Park Ave., Orchard Ave. and 5th Street boarder the property. Across these streets is a residential neighborhood of single family homes. At the far western end on the north side two residences back up immediately to a parking area for the Site.
- South – the Site is bordered by the YMCA and its parking lots on the western end. A residential neighborhood of single family homes is adjacent to the eastern end of the south side adjacent to the wooded area abutting the southern most parking area on the Site.
- East – The site is bordered by Foster Street on the far southern end. Foster Street jogs a little to the west onto East Maple Street and then the site is bordered in the middle by Taft Ave. Across both of these streets are single family homes in a residential neighborhood. Additional residential homes border the central area on the east. The northern half of the east side is bordered by a vacant lot and the North Canton Football Stadium.

- West – The Site is adjoined on the west primarily by two streets, Orchard Ave. on the northern one-quarter of the border and North Main Street on the southern three-quarters of the border. North Main Street is adjoined on the west by office and commercial buildings (including the North Canton City Hall and Public Library), and Orchard Ave. is adjoined on the west by primarily residential units (single family homes). North Main Street is a heavily used four lane primary street, and Orchard Avenue is a much less used secondary street. In the middle of the Site there is a church and an associated playground that border the site directly with North Main Street on the west of the church.

On July 10, 2007 and August 27, 2007, MSG visually inspected the surrounding properties and their operations from the Site and from publicly accessible areas. No evidence of environmental contamination, such as stressed vegetation or stained pavement was observed.

1.3 USER PROVIDED INFORMATION

In accordance with ASTM Standard 1527-05, MSG requested Mr. David Judkins, site representative (Hoover Safety and Environmental Manager – with over six years of experience at the Site) to provide any information, or contacts for personnel who could provide any information regarding the site, as described in the following sections.

1.3.1 Title Records

Stark County records obtained through the Stark County Auditors office and communication with Mr. Judkins (as well as Ms. Mary Shoening – Legal Counsel for TTI) have indicated that the Site is divided into five (5) legal parcels (Figure 2 below). The parcel numbers for each parcel and the Stark County web site where they can be found are:

- 5608114
- 5608115
- 5608116 – Parcel 5608117 is associated with 5608116 as a continuation of the legal description in the County Auditor's records and is not an additional physical parcel.
- 5608118 – Parcel 5608119 is associated with 5608118 as a continuation of the legal description in the County Auditor's records and is not an additional physical parcel.
- 5608120 – Parcels 5608121 and 5608122 are associated with 5608120 as a continuation of the legal description in the County Auditor's records and are not additional physical parcels.

http://www.engineer.co.stark.oh.us/mapmain.asp?toDo=init

A copy of the property deeds are expected to be obtained for the site from EDR in the Environmental Lien Report, which has been ordered and will be provided as a supplement to this ESA. The summary provides the most recent chain-of-title transfer which occurred in early 2007. The Site has one owner, TTI Corp. A copy of the deeds is expected to be provided in the Environmental Lien Report.

Figure 1

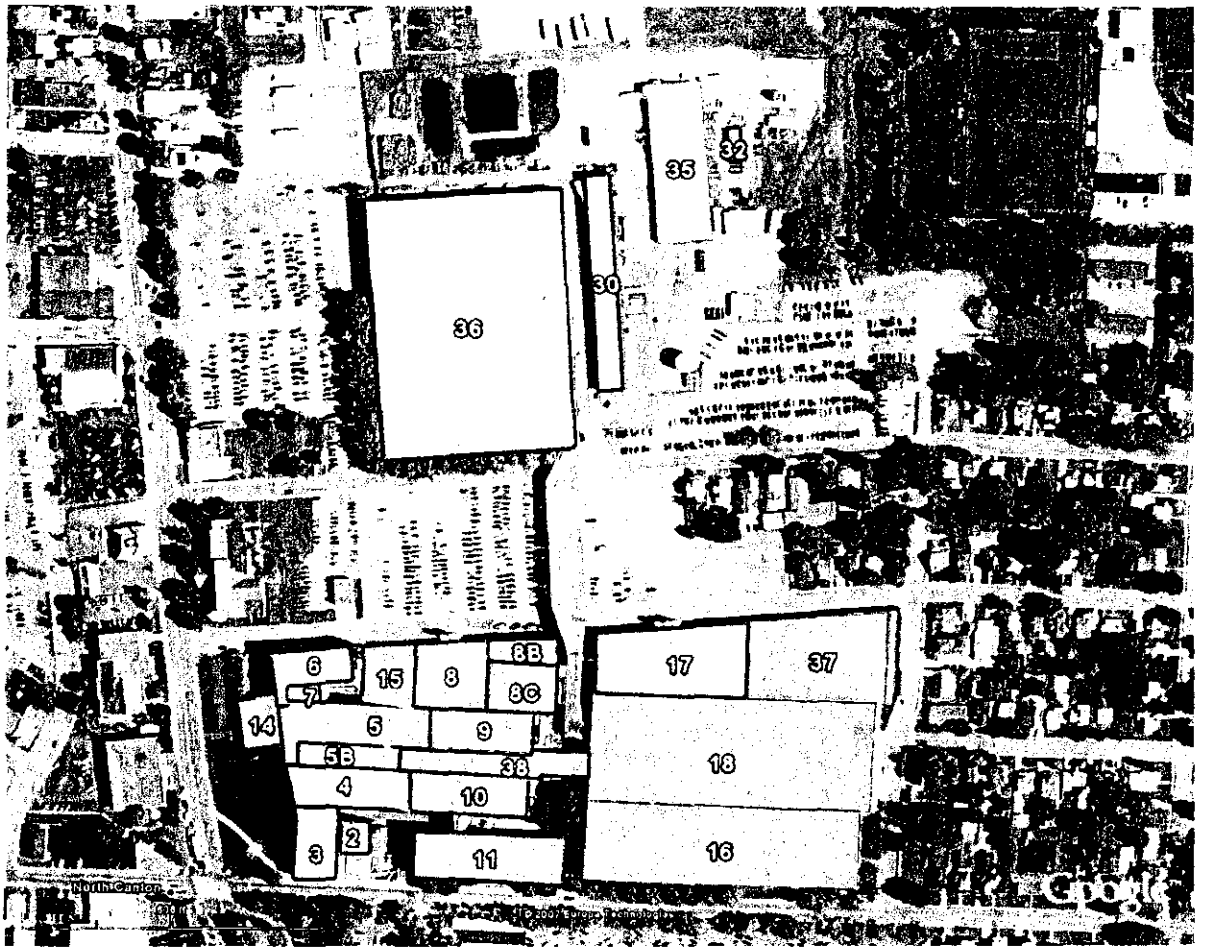
OVERVIEW MAP - 2008707.2s

This report includes interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: The Hoover Company ADDRESS: 101 E Maple St North Canton OH 44720 LAT/LONG: 40.8785 / 81.4000	CLIENT: Mountain Sky Group, LLC CONTACT: Terry Romero INQUIRY #: 2008707.2s DATE: August 20, 2007 10:43 am

Figure 2 – The Site showing the legal parcels

Figure 3 – Building Locations



1.3.2 Environmental Liens or Activity and Use Limitations

MSG ordered an environmental lien review and Activity Use Limitation (AUL) analysis from EDR. A network of professional, trained researchers, following established procedures, used MSG supplied property information to:

- Search for parcel information and/or legal description;
- Search for ownership information;
- Research official land title documents recorded at jurisdictional agencies such as recorders' office, registries of deed, county clerks' office, etc.;

- Access a copy of the deed;
- Search for environmental encumbering instrument(s) associated with the deed;
- Provide a copy of any environmental encumbrance(s) based upon a review of key words in the instrument(s) (title, parties involved, and description), and; provide a copy of the deed or cite documents reviewed;

An Environmental Lien Report was requested from EDR. However, because of the site history, dozens of legal parcels are associated with the Hoover site and EDR was unable to provide a report.

Neither Mr. Dave Judkins nor Ms. Mary Shoening were aware of any environmental liens associated with the Site, or of any pending or threatened litigation involving environmental matters. MSG also did not find evidence that the site is currently involved in any litigation regarding environmental matters.

1.3.3 Specialized Knowledge

MSG does not have any specialized knowledge regarding the Site.

1.3.4 Valuation Reduction for Environmental Issues

MSG was not provided with any information regarding any valuation reduction for environmental issues at the site by the property owner, or by any of the site representatives. MSGs analysis of the Site and its long-term knowledge of the environmentally impaired property marketplace would indicate that the REC on the property involving contaminated groundwater would indicate a valuation reduction for the Site.

1.3.5 Reason for Performing the Phase I ESA

MSG performed the ESA to satisfy due diligence requirements for ORA and its potential financial partners as they are mutually contemplating a purchase of the Site.

1.4 RECORDS REVIEW

The purpose of records review is to obtain and review records that help identify RECs in connection with the site and surrounding vicinity.

1.4.1 Standard Environmental Record Sources

This section includes a summary of federal, state, and local environmental regulatory agency inquiries, database and records research, and available agency file reviews. It also includes the results of the review of reports and documents that have been generated regarding the past and present environmental conditions at the Site. The objective is to identify environmental permits, incidents, complaints, violations, response actions, and remedial activities relating to owners, operators, and tenants on the Site, all abutting and adjacent properties, and on the remaining properties within ASTM-recommended search radii of the site.

MSG contracted EDR to perform a database search of information published by the state and federal regulatory agencies for the site and adjacent and surrounding properties in general conformance with ASTM Standard Practice E 1527-05. MSG also performed a records review with state agencies and contacted local and municipal agencies to determine if the site or nearby properties are listed as having a past or present record of actual or potential environmental impact or are under investigation for an environmental impact.

The Site was identified on the environmental databases searched as a HIST FTTS, OH Spills, ERNS, RCRA-SQG, FINDS, TRIS, RCRA-TSDF, DERR, CORRACTS, CERC-NFRAP, and MSL site. All of the database listings either describe wastewater related incidents involving the Site, or the soils and groundwater issue involving an EPA Corrective Action program (See Section 1.4.4.8). Thirteen wastewater spills were reported for the site between 1996 and 2004. The site received 39 informal notices of violation regarding generator and transport and disposal requirements. None of the database listings provides additional information to cause MSG to determine the presence of a REC other than the groundwater issue that will be described in Section 1.4.4.8 in more detail.

1.4.1.1 Regulatory Listed Facilities

It should be noted that regulatory listings are limited and include only those sites that are known to the regulatory agencies to be contaminated at the time of publication or in the process of evaluation for potential contamination. A copy of the regulatory database report, prepared by EDR, was obtained and reviewed for this project. The EDR Report is provided in Appendix C.

Databases for which at least one site within the corresponding search radius was identified which is upgradient (groundwater flow direction) are as follows (Appendix C):

- Two RCRA Small quantity generator sites within ¼ mile of the Site;
- Two LUST sites up-gradient of the Site, both having No Further Action Letters, and;
- Six LUST sites down-gradient of the Site, all having No Further Action Letters.

MSG reviewed the results of the database search to note reported release sites in the vicinity of the Site which were considered to have a potential adverse impact on the Site (i.e., are known to have or are expected to result in recognized environmental conditions – RECs). Reported release sites identified in the regulatory agency database search were evaluated with respect to the nature and extent of a given release, the distance of the reported release from the Site, and the position of a reported release site from the Site, and the position of a reported release site with respect to known or expected local and/or regional groundwater flow direction. Generally, reported release sites located within ¼ mile upgradient, 1/8 mile cross-gradient (none in this category for the Site) or adjacent down gradient (none in this category for the Site) are considered to have a potential to have impacted the Site, and were further assessed by reviewing agency records and the many documents that MSG has regarding the Site. Sites that were listed in the database search report, but not identified as a release site (e.g. a site listed as a hazardous waste generator but not as having had a release) and sites that were listed as being "closed" were not considered to have a potential to have impacted the Site.

Based on the above criteria, no sites present a REC for the Site based on their reported activities.

1.4.1.2 Orphan Regulatory Review

The orphan or unmapped site list consists of sites currently listed in federal or state databases that have inadequate address information. However, if street addresses are available, the site locations are checked against the known location of the subject property to determine their relative location to the select ASTM search distance from the subject property.

Sites listed as "orphan" sites were reviewed, and 7 orphan sites were identified. Further information on these sites is provided in the EDR Report. Based on available address information and review of on-line mapping databases (www.mapquest.com), none of the orphan sites identified appear to be located within a 1-mile radius of the Site or had issues that could impact the Site.

1.4.2 Additional Environmental Record Sources and Historical Site Activities

As described previously in this report, MSG has considerable experience working with environmental conditions associated with sites like this one. MSG reviewed additional documents (Listed in Section 3) that were made available to accurately assess this Site. From this review the only issue that was identified as a REC for the site involves the groundwater that will be discussed in detail in Section 1.4.4.8.

1.4.3 Physical Setting

The Site is 87 acres of land (subject property) with approximately 25 acres of manufacturing and warehouse space (Figure 2). The remaining 62 acres is used for parking, trailer storage, and public recreation. The Hoover Company facility is a household vacuum and steam cleaner manufacturer. The Site is located in the central downtown area of North Canton, OH, immediately across the street (North Main Street) from the City Hall. The approximate latitude and longitude of the center of the site are 40.878500 – 40 degrees 52'42.6" North and 81.400000 – 81degrees 24'0.0" West. Descriptions of the topography, soils and geology, and hydrogeology are presented below.

- Physical Setting – The Site is located in northern area of Ohio. The setting is generally urban with the uses in the area being a combination of commercial, industrial and residential (primarily residential).
- Topography – A series of U.S. Geological Survey (USGS) 7.5 minute topographic maps from 1903, 1958, 1967, 1978, 1984 and 1994 were obtained from EDR and reviewed to identify physical features in the vicinity of the Site (Appendix D). The Site is approximately 1,160 feet above mean sea level. The local topography is relatively flat, with the ground surface sloping to the west. There are no prominent physical features identified from the topographic maps or from visual observation that distinguish the Site.
- Surface Water and Flood Plain – No surface water features (i.e., ditches, creeks, lakes, and ponds) were observed on the Site by MSG, other than the industrial wastewater treatment ponds. The nearest water bodies, Nimishillen Creek (east) and the West Branch of Nimishillen Creek (west), are located less than 1 mile from the site. MSG

reviewed the Federal Emergency Management Agency (FEMA) maps for the Site Area and determined that the Site is outside of the 100 and 500 year flood zones.

- Wetlands – There is one wetland area identified through the EDR state of Ohio wetlands database on the Site. This wetland if present would be located directly underneath the oldest manufacturing building on the Site (Figures 1 - 3). MSG suspects that there is a problem with the depiction on the state database. No wetlands areas were observed on the property or indicated by National Wetlands Inventory.
- Endangered Species – MSG did not do an extensive search regarding endangered species, but having worked with a number of other sites in this area it is our professional belief that there are not endangered or threatened species impacted by the Site.
- Oil and Gas Well Search – MSG ordered an oil and gas well search from EDR, and the results of that search are presented in Appendix C. There are no wells located between ¼ and ½ mile of the Site.
- Soils and Geology – The U. S. Department of Agriculture Soil Conservation Service indicates that the soils at the subject property are classified as Chili loam (silt-clay). The unconsolidated soils, consisting of glacially deposited sand, gravel, clay and silt layers, range in thickness from 5 feet to 40 feet beneath the site (CH2M HILL August 2003). The Pennsylvanian-age bedrock consists of thin, inter-bedded layers of sedimentary rock. The soils texture is identified as variable. The bedrock strata underlying the property consist of rocks from the Lower Paleozoic Granitic Rock Series.
- Hydrogeology – According to the Final Corrective Measures Proposal (CH2M HILL 2003a), the presence and flow direction of groundwater in the unconsolidated soil beneath the site .varies. Groundwater flow direction in the northeast comer or-the site is towards the north northeast, to the west-northwest in the northern half of the site; and to the southeast in the southeast corner of the site. The variable flow direction is a result of the uneven bedrock surface. Groundwater elevations vary between 10 feet below ground surface (bgs) and 25 feet bgs.
- Potable Water Supply – The City of North Canton provides potable water and wastewater services to the Site. Potable water of the City of North Canton is drawn to the surface from wells located within the City of North Canton.

1.4.4 Historical Use Information on the Site and Adjoining Properties

The purpose of this review of the history of the previous uses of the site and surrounding area is to help identify the likelihood of past uses having led to RECs in connection with the site. Information obtained from the site inspection, interviews with persons familiar with the property, and review of topographic maps and the city directory report, suggest that the site has been used primarily as a household vacuum cleaner and steam cleaner manufacturing site since 1909, and used as a tannery and leather goods manufacturing site beginning in 1908.

Previous uses of the property and properties in the surrounding area, to the extent that this information was revealed in the course of researching the site, were developed consistent with ASTM Standard of Practice E 1527-05. From standard historical sources specified in the ASTM practice, MSG reviewed

those sources listed below. Available copies of representative historical source information are provided in Section 3.

1.4.4.1 Aerial Photography Review

Historic aerial photographs of the Site for the years 1976, 1982 and 2000 (see Appendix E) were available from EDR. A summary of the aerial photograph review conducted by MSG is presented in Table 2.

Table 2
Summary of Aerial Photograph Review

Year	Site Use	Surrounding Property Observations
1976	Manufacturing of vacuum cleaners and steam cleaners	Primarily residential and commercial
1982	Manufacturing of vacuum cleaners and steam cleaners	High school and football stadium have been constructed since 1976
2000	Manufacturing of vacuum cleaners and steam cleaners	Much clearer aerial, one less water treatment pond on the Site from 1982, no new buildings

1.4.4.2 Sanborn Maps

Sanborn maps can provide information such as building usage and neighboring property usage. MSG obtained three Sanborn Maps (1946, 1948 and 1952) from EDR (Appendix F). These maps validated reported site usage and surrounding site usage.

1.4.4.3 Property Tax Files

Property tax files can include records of past ownership, appraisals, maps, sketches, photos, or other information pertaining to the Site. MSG did not conduct a review of tax files for the site.

1.4.4.4 Environmental Lien Search Report

An Environmental Lien Report was requested from EDR. However, because of the site history, dozens of legal parcels are associated with the Hoover site and EDR was unable to provide a report.

Neither Mr. Dave Judkins nor Ms. Mary Shoening were aware of any environmental liens associated with the Site, or of any pending or threatened litigation involving environmental matters. MSG also did not find evidence that the site is currently involved in any litigation regarding environmental matters.

1.4.4.5 Historical Topographic Maps

According to the ASTM Standard, the primary objective of historical color topographic map analysis is to document site usage. Topographic maps show roads, railroads, creeks, oil and gas wells, and structures present on a property at the time the map was created or photo-revised. When topographic maps are photo-revised, past structures that no longer exist are usually removed from the topographic map, while newer structures are added.

A series of U.S. Geological Survey (USGS) 7.5 minute topographic maps from 1903, 1958, 1967, 1978, 1984 and 1994 were obtained from EDR and reviewed to identify physical features in the vicinity of the Site (Appendix D). As stated in an earlier Section the Site is relatively flat with no prominent physical features to distinguish the Site.

1.4.4.6 Local Street (City) Directories

City directories have been published for cities and towns across the United States since the 1700s. These historical directories provide a tool for the location of individuals and businesses in three sections: a business index, a list of resident names and addresses, and a street index. These directories can provide information on former business operations at and/or near a site. EDR conducted a search of city directories included in Appendix G.

1.4.4.7 Building Department Records

Building department records at local governments can indicate permission to construct, alter, or demolish improvements at the site. MSG did not obtain building department records as part of this investigation.

1.4.4.8 Summary of Historical Information

As mentioned several other times in this assessment there is an abundance of historical information regarding the Site provided by environmental reports and documents generated from the 1980s through the current time. The narrative below summarizes the historical use of the Site and the surrounding area as compiled from a variety of the reports which were reviewed.

Based on interviews with facility personnel; a review of previous environmental reports; a review of Sanborn fire insurance maps from 1946, 1948, and 1952, and; aerial photographs from 1976, 1982, and 2000. Hoover began manufacturing electric sweepers at the site circa 1909. The site was previously used as a tannery and leather goods manufacturing facility starting in 1908. Prior to that time, MSG could not find specific knowledge of the Site usage, but it is suspected that the Site was used for agricultural purposes, since it was described as being the Hoover family farm.

While the first sweepers were assembled from wood, tin, cloths and horsehair, by 1909 they were manufactured from aluminum die casts. By 1911, Hoover also began manufacturing the motors to run the sweepers. From the early 1900s until the 1950s, manufacturing operations are believed to have consisted of aluminum die casting (water- and oil-operated). alloying, metal finishing, motor manufacturing, plating, painting, and assembly.

Historically; some wastes generated through Hoover's manufacturing processes were managed at the facility in designated areas as described in the Material Waste Management Areas Inventory for Hoover Plant I (CH2M HILL 1997 and 2003b). Other wastes were transported off-site as described in Section 1.5.3.9.

Environmental investigations of the Hoover site began in 1988 with the preliminary investigation for the closure of the drum storage area near Building 30, followed by a comprehensive site investigation in 1999. Several subsequent investigations have focused on delineation of contaminated groundwater and soil, and to provide information for remedy design.

Chemicals of concern (COCs) at the subject property include: metals. polycyclic aromatic hydrocarbons (PARs), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs). The Hoover site has been subdivided into nine distinct parcels with respect to corrective actions: Active Facility, Southern Lots, Middle Lots, North Yard, Regulated Unit, Public Access Areas – Soccer and Little League Ball fields, Dogwood Fields, Game Patron Parking Lot (referred to as Site B), Site A Lots, and Offsite. Corrective Action parcel boundaries were defined based on current and historical land use, former waste management activities, and investigation results. In order to achieve regulatory agency risk reduction goals, stabilization measures (i.e., excavation, dual phase extraction) were implemented in the North Yard, Active Facility (Building 18), Regulated Unit, and Public· Access Parcel. Institution controls, such as land use restrictions, were implemented in select parcels to assure that exposure pathways remain under control and that the remaining COCs achieve risk reduction goals. Reportedly, corrective action is complete without controls at the Southern Lots, Public Access Areas, and Active Facility parcels, with the exception of Building 18. The institutional controls implemented at the Hoover site include City Ordinances, a groundwater use resolution, and equitable servitude agreements. In addition, Hoover has implemented several voluntary actions including a Subsurface Work Plan, implementation of a natural attenuation groundwater monitoring program, and the operation of soil vapor extraction (SVE) and dual-phase (DP) groundwater treatment systems. The SVE and DP groundwater treatment systems operated from June 2002 until fall 2004.

However, it should be noted that contaminated groundwater has migrated offsite and evidence suggests that the public sewer system has intercepted the plume. Although a groundwater use resolution has been adopted by Stark County, an EDR search of local and regional water agency records indicate that a groundwater well owned by the World of Life Church is located less, than 1/8 mile from the site. In addition, light non-aqueous phase liquid is still floating on groundwater in the Active Facility Parcel.

The remedy requires long-term operation and maintenance, consisting of groundwater monitoring and maintenance of the institution and engineering controls. The proposed monitored natural attenuation remedy does not include additional source removal; however there remains up to 1.3 feet of floating petroleum product on the groundwater. The floating product contains a relatively high concentration of chlorinated volatile organic compounds which will likely act as a continuing source of groundwater contamination for the foreseeable future. The U.S. Environmental Protection Agency monitored natural attenuation protocol *(Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground' Water. EPA/600/R981128, September 1998)* specifically requires source removal as part of the remedy.

MSG is concerned that as part of the closure requirements or during post-closure monitoring (due to the continued presence of light non-aqueous phase liquid and elevated groundwater contamination), that additional source removal will be required. The VOCs in groundwater have migrated under the residential, commercial, and industrial properties west of the Hoover property. The risk assessment concludes that the presence of the contamination does not pose an unacceptable risk to the site occupants; however, the properties have been adversely affected by the presence of the groundwater contamination. Based on experience at other sites, the potential exists that the property owners could claim that the contamination has affected the value of the properties and, possibly, could pose a health risk. For the reasons stated above, MSG believes this VOC issue in the groundwater underlying the Site and adjoining properties creates a REC for the Site.

Other than the groundwater condition identified in the preceding text as a REC, there are no other recognized environmental conditions (RECs) in connection with the Property that were discovered during review of historical site use information sources for the Site or for adjacent sites.

1.4.4.9 Data Gaps in Historical Use Information

Property tax files and building department records were not obtained for this survey. This minimal data gap circumstance has no impact on MSGs ability to determine assess the possible RECs and environmental concerns for the Site.

1.5 SITE RECONNAISSANCE

The objective of the site reconnaissance is to obtain information indicating the likelihood of identified RECs in connection with the site. Information for this section was obtained during the site visit performed by Dr. Wayne Dorband and Mr. Terry Romero of MSG on July 10, 2007, and by a second site visit performed by Dr. Dorband on August 27, 2007.

1.5.1 Methodology and Limiting Conditions

During both of the site visits, weather conditions were clear and calm with temperatures in the mid 80s. Mr. David Judkins accompanied MSG's inspectors during the entire inspection of the site. MSG inspected the site for evidence of current or past use, storage, or generation of hazardous materials and/or petroleum products on the site. MSG also inspected the site for evidence of a release or threat of release of hazardous materials to the environment on or in the vicinity of the site. Such evidence may include oil and grease staining, stressed and/or dying vegetation, UST vent/fill pipes, dumping activities, noxious odors, and/or storage of hazardous substances.

1.5.2 General Site Setting

As previously stated the Site is primarily a household vacuum and steam cleaner manufacturing site. About 25 acres (~1,218,000 sq. ft.) of the site is covered by buildings and the rest is mainly parking, storage and recreation facilities used by the City of North Canton. Descriptions of the site location, improvements, current and past uses, physical setting, and utilities were previously presented in the Sections 1.2 and 1.4.

1.5.3 Site Observations

The following sections discuss the site observations.

1.5.3.1 Materials Handling and Storage Practices

MSG inspected the Site for possible chemical or hazardous materials storage and handling issues. Hoover stores the following materials onsite: steel, plastics, plating chemicals (e.g. metals, acids. caustics), oils, lubricants, wastewater treatment chemicals, gasoline, and diesel fuel. Plastics used in the injection molding processes are received in bulk and stored in storage silos on the north side of Building 17 or are received in bulk cardboard boxes. Gasoline is used to fuel company vehicles and is stored in a 1,000gallon underground storage tank located in the parking lot in the northern portion of the property. Oils and lubricants are stored in several aboveground tanks, totes, and drums at various locations throughout the manufacturing areas. MSG observed these during the Site inspections and did not note any issues associated with the storage protocol. No leaks or evidence of leaks was noted.

Other chemicals used onsite, including wastewater treatment chemicals and plating chemicals, are received by truck and stored in the chemical storage area in Building 30 before being delivered to the areas where they are used. MSG reviewed the Material and Waste Management Areas Inventory, dated November 1997, and the Material and Waste Management Areas Inventory Amendment dated July 2002 for the site, prepared by CH2M HILL. The reports summarize the current and former materials and waste management practices at the site to identify areas that may be considered solid waste management units (SWMUs) or areas of concern (AOCs) under the Resource Conservation and Recovery Act (RCRA) Corrective Action Program. The reports identified 43 areas at the facility as either a regulated unit, SWMU, or an AOC. The subsequent investigations and remedial activities conducted onsite focused on nine areas, as documented in the Final Corrective Measures Proposal (CH2M HILL 2003a). These areas are the regulated unit (former drum storage area), the North Yard, the Active Facility, Public Access Areas, Middle Lots, Southern Lots. Site A Lots, Game Patron Parking Lot, and Offsite (adjacent to Hoover property).

Most of the chemical containers observed by MSG were marked with labels indicating their contents. None of the chemical containers were observed to be leaking or rusted.

All incoming materials are received and distributed by truck to the main building or the equipment storage buildings. Fuel is offloaded at the aboveground storage tanks throughout the site. According to facility personnel, no spills of liquid materials have occurred during unloading activities.

According to facility personnel and based on MSG observations, Hoover stores materials onsite in quantities sufficient to trigger reporting requirements under Title III of the Superfund Amendments and Reauthorization Act (SARA). According to Hoover records, this includes Section 302 (which requires reporting of extremely hazardous substances stored or used on-site in a quantity greater than or equal to its threshold planning quantity) and Sections 311 and 312 (which require reporting of hazardous chemicals present onsite in excess of specified thresholds). Under Section 302, the facility stores and uses sulfuric acid, an extremely hazardous substance, in quantities exceeding its threshold planning quantity. The facility made all of the proper notifications to the appropriate agencies and has designated an emergency coordinator. Under Sections 311 and 312 the facility submits annual hazardous chemical

inventory reports to the appropriate agencies for numbers of chemicals, including sulfuric acid, oils, and plating chemicals, that are stored onsite at anyone time in excess of reporting thresholds. Based on the facilities SIC code, Hoover is subject to the toxic release reporting requirements of Section 313 of SARA. Title III, and submits annual Form R toxic release inventory reports for chemicals manufactured, processed, or otherwise used onsite including styrene, copper, and mercury.

No recognized environmental conditions (RECs) were identified during MSGs review of materials handling and storage activities.

1.5.3.2 Storage Tanks

There are two underground storage tanks currently located on the subject property. One is a 1,000-gallon underground tank. used to store unleaded gasoline for vehicles. The tank is located in the parking area near the entrance to the northern portion of the property. It was installed in 1987 and is constructed of fiberglass. According to the Material and Waste Management Inventory Report (CH2M HILL 1997), the existing tank meets the underground storage tank technical requirements for release detection, corrosion protection, and overfill protection.

The second existing underground storage tank is a 30,000 gallon tank used to store diesel fuel as a backup fuel for one of the boilers. The tank is located outside in the visitor parking lot on the .south side of Maple Street. The tank was constructed of steel in the early 1970s and is not regulated as an underground tank because it stores heating oil for consumptive use onsite.

According to facility personnel, the tank is no longer used and may contain some residual product. Also according to facility personnel, the tank system passed a tightness test in 2005. The tank has no other leak detection system.

According to facility personnel and the Material and Waste Management Inventory Report (CH2M HILL 1997), there are former underground storage tanks that have been removed from the Site. Three former steel tanks were removed from the area of the current gasoline underground tank in 1987. One tank stored leaded gasoline, and the remaining two tanks contained diesel fuel. The three tanks were installed before 1967 and were removed in 1987 under the oversight of the Ohio Fire Marshal's Office. A release was reported when the three original tanks were removed. Soil samples collected following tank removal indicated that residual hydrocarbon concentrations were below the regulatory reporting requirement of 100 parts per million total petroleum hydrocarbons. Hoover received a letter from the Bureau of Underground Storage Tank Regulation (BUSTR) stating that no further actions were required related to the three removed tanks. Numerous soil and groundwater samples have been obtained in the vicinity of these removed tanks in the last several years, and there has been no evidence of releases from these tanks. Based on this information, the historic release is not considered to be a REC.

A 500 gallon underground storage tank was previously located in the North Yard, east of Building 30. The tank was used to store kerosene and used oil. The tank was removed in the spring of 1986 and, according to site personnel, was reported to have been deteriorated at the time of its removal. No agency oversight of the removal activities was performed. The Building 30 Former 500 gallon Underground Tank was identified as a SWMU in the RCRA Corrective Action process. The RCRA facility investigations did

not identify any releases from this SWMU, therefore, the former tank is not considered a recognized environmental condition.

A former 10,000 gallon underground tank was located outside in the North Yard, immediately east of Building 30. The unit was used for the storage of kerosene believed to have been used to fuel equipment in Building 30. According to the Material and Waste Management Inventory Report (CH2M HILL 1997), the tank operated from the mid-1940s until the mid-1950s and was removed from the ground in 1986. The tank was reported to be in good condition when it was removed, and no releases were identified. Based on this information, the former tank is not considered a recognized environmental condition.

A number current and former aboveground storage tanks are associated with the subject property. According to facility personnel and the previous Phase I environmental assessment of the property (Earth Tech 2006), the following aboveground tanks are associated with the property:

- former hydraulic oil aboveground storage tank (AS1) farm north of Building 35
- three former 10,000 gallon bulk oil ASTs west of the spray pond
- two 3,000 gallon used oil ASTs inside the north portion of Building 35
- one 8,000-gallon used hydraulic oil AST inside the southwest comer of Building 8
- one 2,000 gallon settling/distillation tank inside the southwest "comer of Building 8
- two 5,000 gallon reprocessed oil tanks in the utility tunnel of Building 8
- one 500 gallon diesel fuel AST near the Firehouse
- an empty AST near the Cooling Tower and Pump House (capacity unknown)
- a 500 gallon sulfuric acid AST near the Treatment Ponds
- a 500 gallon diesel AST near the Treatment Ponds

All of the aboveground tanks on the subject property are equipped with secondary containment. No evidence of spills or releases from any of the aboveground tanks was observed at the time of the site visits.

According to oil pollution prevention regulations promulgated under the Clean Water Act facilities that store more than 1,320 gallons of oil aboveground at anyone time are required to develop and implement a spill prevention, control, and counter measures (SPCC) plan where a release occurs. Hoover does maintain a SPCC plan as required.

1.5.3.3 Odors

No odors were detected during the site reconnaissance.

1.5.3.4 Pools of Liquid

No pools of liquid were observed during the Site reconnaissance.

1.5.3.5 PCBs

The Toxic Substance Control Act (TSCA) of 1976 regulates the use, handling, transport, and disposal of polychlorinated biphenyls (PCB). PCBs are typically found in oil-filled electrical equipment such as transformers, capacitors, and fluorescent light ballasts or heat transfer equipment. Based on interviews with facility personnel and a review of Hoover's PCB Elimination Projects Summary, dated May 29, 1998, the facility had 23 oil-filled transformers that historically contained varying concentrations of PCBs. From 1989 through 1995 the facility undertook a program of PCB elimination from all of its on-site transformers. PCB containing transformers were either removed and disposed of off-site or retrofitted to reduce PCB concentrations. According to the summary, all transformers were classified as "Non-PCB" transformers less than 50 parts per million PCBs by January 1995. No leaks or stains were observed in the vicinity of on-site transformers. Most transformers were labeled "Non-PCB," which indicates that the transformers do not contain PCBs. Because no leaks or stains were observed in the vicinity of the transformers and because the transformers do not contain PCBs this issue is unlikely to pose a recognized environmental condition.

Facility personnel reported that none of the hydraulic equipment used on-site utilizes hydraulic fluid containing PCBs. Facility personnel also noted that PCB containing ballasts have been used at the site. PCB ballasts removed from service are stored in a designated area in the waste storage area and are shipped offsite to Ross Incineration Services as a Toxic Substances Control Act-regulated PCB waste.

Based on MSGs observations, it is unlikely that there are any PCBs at the facility from present use, except for the small quantity of PCBs contained in the light ballasts.

1.5.3.6 Pits, Ponds or Lagoons

No ponds or lagoons were observed during the site reconnaissance or reported during interviews, other than the industrial wastewater treatment ponds described in Section 1.5.3.10. However, MSG did observe and was told by Hoover personnel about a sludge pit that is located just to the north of the industrial wastewater treatment ponds. This pit is lined and was dry during the site visit on August 27, 2007. MSG does not believe this pit poses any type of environmental concern or REC.

1.5.3.7 Stained Soil or Pavement

Typical staining associated with parking lots was observed at the site. This staining is considered a "deminimis" condition. Some staining and leaking was identified inside the manufacturing buildings related to various pieces of equipment used in the manufacturing process (Appendix A). Because of the long-term history (over 100 years) of use for metal plating, plastic extrusion, and other uses involving hazardous chemicals, MSG is concerned about the possible contamination of building floors and the possible leakage into soils below these floors. Personnel interviews and report reviews indicate that minimal sampling has ever occurred of the concrete floor surfaces or through the floor surfaces into the soils below. MSG believes this is not significant enough to be considered a REC, but should be a concern and may pose substantial costs to a possible future reuse if the building floors should need to be penetrated or demolished.

1.5.3.8 Stressed Vegetation

No dead, distressed, discolored, or stained vegetation was observed during the Site reconnaissance.

1.5.3.9 Solid and Hazardous Wastes

The Hoover facility is currently registered as a small quantity generator of hazardous waste and operates under an EPA identification number. The primary hazardous waste streams generated by Hoover include: waste plating liquids, waste flammable liquids from painting, waste treatment, varnish, laboratory packs, and groundwater from the ongoing groundwater monitoring program. In previous years, the facility has been regulated as a large quantity generator because of hazardous soil and groundwater generated from the on-site remedial activities.

Hazardous waste is removed and treated by Ross Environmental Inc. at their permitted treatment, storage, and disposal facility in Grafton, Ohio. As summarized in the Material and Waste Management Areas Inventory report (CH2M HILL 1997), historical waste management practices included on-site disposal in SWMUs including the Regulated Unit (former drum storage area), Site B, oil pits, Pond 5, Site A, and the Former Refuse Disposal Area. Hazardous waste is currently stored in the chemical storage room located in Building 30. During the Site inspection on August 27, 2007 there were storage containers present in the storage area. All containers were properly labeled and closed. No cracked concrete or floor drains were observed in the chemical storage room. A concrete sump in the waste storage area is situated below a drum crusher and is used to collect drips of oil from the crushing of empty drums of oils and lubricants. Facility personnel reported that the sump is regularly pumped out, and the used oil is stored in the used oil aboveground tanks in the waste storage area.

Used oil and lubricants are generated from numerous machining activities onsite. Used oil from the machining areas in Buildings 16 and 18 is stored in a 1,000 gallon reclaim tank in Building 16, and heated and filtered before being reused. Used filters and absorbents are managed as a nonhazardous waste for recycling by Ross Environmental. Used oil to be sent for recycling is stored in several above ground tanks throughout the site, consisting of an 8,000 gallon tank in the main manufacturing building; two 3,000 gallon tanks in the basement beneath Building 8; and two 3000 gallon tanks in the waste storage area in Building 35.

The primary nonhazardous wastes generated onsite include: waste plastics, used oil, waste coolant, phosphate sludge, filter cake, waste powder paint, used absorbent media, scrap metal, cardboard, wood, rags, lead acid batteries, and plant trash. Lead acid batteries, scrap metal, cardboard, and rags are collected for recycling. Waste plastics are either melted and reused in the injection molding processes or are disposed of offsite as a nonhazardous waste.

Nonhazardous wastes are transported offsite for disposal by Republic Waste and disposed of at the municipal landfill in Canton, Ohio. Facility personnel reported that there have been no inspections by regulatory agencies regarding waste management practices in several years.

According to the EDR database report, the Hoover facility had numerous RCRA violations of generator requirements from inspections conducted between the years of 1985 and 1995. The database indicated

that all compliance actions were closed and that there are no outstanding enforcement actions or violations related to RCRA requirements.

No recognized environmental conditions were identified during MSGs review of solid and hazardous waste management activities.

1.5.3.10 Water, Waste Water and Storm Water

The facility obtains its water from the City of North Canton public water supply. No water supply wells are located on the subject property.

Process wastewater from the phosphating and plating solutions in Building 37 is treated in an onsite wastewater treatment system consisting of settling and flocculation to remove zinc and adjust the pH. The removed plating sludge is sent off-site as a nonhazardous waste. The treated plating/phosphate wastewater is then routed through an industrial sewer system onsite to a series of ponds located north of Building 36. In addition to the treated wastewater, other sources on-site discharging to the pond system include floor drains throughout the facility, non-contact cooling water, cooling tower and boiler blowdown, and storm water from onsite roofs and materials handling areas. The pond system consists of a 30,000 gallon oil skimmer, a 50,000 gallon aerator basin, four settling ponds, and two dewatering beds. The oil skimmer and aerator beds are underground concrete basins. The settling ponds have concrete on some sides, but are unlined.

The ponds, constructed between 1944 and 1951, serve as both storm water holding lagoons and industrial waste treatment ponds before they discharge through a permitted National Pollutant Discharge Elimination System (NPDES) outfall to Zimber Ditch. Sludge removed from the ponds is pumped to the dewatering beds to remove excess water before offsite disposal. Aeration and pH control are also performed in the wastewater treatment ponds.

Discharged to Zimber Ditch

The discharge from the wastewater treatment ponds is regulated by an NPDES permit issued by the Ohio EPA. The permit was issued on September 1, 2006, and expires on August 31, 2011. The facility is required to monitor its discharge from the outflow to Zimber Ditch and submit discharge monitoring reports to the Ohio EPA. The discharge is monitored weekly for pH, total suspended solids, oil and grease, zinc, copper, methyl blue active substances, and flow rate; quarterly for fluoride; and monthly for total toxic organics. According to facility personnel, there are no current violations or exceedances related to the wastewater permit. There were exceedances of the zinc and pH permit limits in November 2006; however, the facility conducted the appropriate notification to the state and conducted re-sampling and follow-up efforts, and there were no fines or additional actions required.

According to facility personnel and historical records, no septic systems or cesspools have ever been present onsite and none were observed. The sanitary wastewater streams are discharged directly to the city of North Canton municipal sewer system.

Storm water at the site for facility roofs and paved materials handling areas are routed to the onsite wastewater treatment ponds and treated in accordance with the facility's NPDES permit, as described previously. Storm water from parking lots and other areas of the facility discharge though storm drains to the North Canton storm sewer system. The facility's storm water discharges are covered under a general

permit to discharge storm water under the NPDES regulations. The general permit was issued by the Ohio EPA on August 1, 2000 and expired on July 31, 2005; however, permit coverage was extended by Ohio EPA and a new general permit is issued. The terms of the storm water permit require the facility to create and maintain a storm water pollution prevention plan (SWPPP). Hoover maintains a comprehensive pollution prevention plan, dated July 2005. In accordance with the SWPPP, facility personnel conduct semiannual storm water inspections and annual monitoring. Records of the inspections are kept with maintenance personnel who perform the inspections.

No recognized environmental conditions were identified during the review of the facility's water, wastewater, or storm water discharges.

No dry wells, irrigation wells, injection wells, abandoned wells or other wells are known to exist at the Site or were observed at the site on the day of the site visit. As mentioned in Section 1.4.3.6, a water well search was conducted by EDR to locate known private and public water wells within a one mile radius from the site. A copy of the water well search is included in the EDR Report in Appendix C.

Check on this!

1.5.3.11 Air Emissions

Point source air emissions are generated from a number of sources onsite including coal fired boilers, natural gas boilers, heaters, varnishing operations and drying ovens, injection molding machines, a pyrolysis oven. a spray booth, gasoline dispensing, and welding operations.

The facility submitted an application as a minor Federally Enforceable Stale Operating Permit (FESOP) source for the entire facility in 1995, with an updated application in 2006. Because the facility has not yet received the FESOP permit from the Ohio EPA, the numerous sources are covered under individual permits to operate (PTOs), permits to install (PTIs), or registrations from the Ohio EPA. For the coal fired boiler, the facility is required to continuously monitor opacity and maintain records on coal burned and chemical composition of the coal. Other PTOs and PTIs for the facility generally require that the facility record production and chemical usage rates to demonstrate compliance. According to facility personnel, there are no outstanding violations related to its air permits.

No recognized environmental conditions were identified during the review of the facility's air emission sources.

1.5.3.12 Septic Systems

No on-site septic systems or cesspools are known to exist at the site or were observed at the Site on the day of the Site visit.

1.5.3.13 Lead Paint

The structures that exist at the Site were for the most part constructed prior to 1978. Based on the age of these structures, there is a potential for lead-based paint to exist which constitutes an on-site concern. However, no visible flaking and deteriorating suspect lead-based paint was observed during the MSG site visit.

MSG recommends that the building surfaces be routinely monitored, and whenever a surface is observed to be flaking that it be reported to the Site Manager. These flaking surfaces should be compared to the survey results to see if they were previously determined to be lead containing, and if so the paint should be removed using an acceptable lead removal protocol. MSG recommends preparing a lead management protocol for the Site.

If demolition or renovation activities take place that may disturb these lead-containing surfaces and may expose workers to elevated levels of airborne lead, the contractor must comply with applicable regulatory standards. MSG further recommends that any contractor who disturbs these leaded surfaces during demolition or renovation activities be notified of the hazard and their need to comply with the appropriate regulations.

1.5.3.14 Lead in Drinking Water

MSG did not observe any drinking fountains or other potable water supplies that would indicate a possible human health hazard related to lead exposure.

1.5.3.15 Radon

The site is located in Stark County, Ohio which is in a U.S. Environmental Protection Agency (USEPA) Radon Zone of 1. Zone 1, an area of high radon potential, has an indoor average radon levels above 4 Pico Curries per liter (pCi/L), greater than the residential action level.

MSG believes that this potential radon risk is an environmental concern for the Site. Especially if portions of the Site will be repositioned as mixed use residential and commercial it will be important to complete an air sampling protocol and determine whether radon gas is present in high enough levels to be considered as a threat to human health.

1.5.3.16 Asbestos Containing Materials

An asbestos survey was conducted at the facility by American Analytical Laboratories in January 2000. Results of the survey report indicated that asbestos-containing material (ACM) is present at the facility in Galbestos type siding (transite), thermal insulation, floor tile and mastic, asbestos cement board and ceiling tile.

MSG did not evaluate the survey for completeness or accuracy, and MSG cannot guarantee that the survey accurately characterizes site conditions. Based on the results of the survey, facility personnel reported that several small asbestos removal projects have been completed on an as-needed basis. The remaining ACM are managed in place in accordance with the facility's Asbestos Operations and Maintenance Plan, prepared by American Analytical Laboratories in January 2000.

MSG was requested to determine if any readily observable building materials have the potential to contain asbestos. MSG was not contracted to perform a comprehensive asbestos survey or testing of materials for asbestos content. During the course of the on-site inspections, MSG inspectors observed siding, thermal system insulation, floor tiles or other sheet flooring, roofing materials, window sill caulking, drywall mud, transite building siding, and ceiling tiles, which are building materials that may

contain asbestos. MSG inspections did not reveal any of the potential ACM to be in poor condition. Therefore, MSG does not believe that the asbestos present would constitute any type of an environmental REC, but should be considered as a concern for the Site.

1.5.3.17 Mold issues

MSG did not observe any evidence of mold or water stained surfaces at the Site. Also, Hoover representatives did not recall any complaints regarding indoor air quality that have occurred involving Site employees, occupants or visitors. Therefore, MSG does not believe that mold is a concern or REC for the Site.

1.5.3.18 Occupational Safety and Health

Hoover's health and safety practices are managed by Mr. Judkins. The facility maintains a hazard communication plan and trains employees on required safety programs onsite. In addition, monthly safety meetings are held onsite. Material safety data sheets (MSDSs) are maintained online by MSDS Solutions for chemicals used and stored onsite. All employees who handle chemicals now receive hazard communication training.

Hoover has implemented an indoor air quality monitoring program and has conducted indoor air quality surveys in specified areas. Facility personnel reported that respirator use is required for facility personnel conducting painting operations in the maintenance shop paint booth.

Hoover has also implemented an employee medical monitoring program that consists of entrance and exit physicals and annual physicals for all painters. According to facility personnel, no employees have ever suffered an employment-related injury or illness related to emissions or exposure to chemicals that resulted in a compensation claim or lawsuit. The facility has not had any OSHA inspections in several years, and there are no outstanding OSHA fines or violations according to facility personnel. No noise complaints have been received from any neighbors.

1.6 INTERVIEWS

The objective of the interviews is to obtain information concerning RECs in connection with the site. This information was conveyed verbally. No site questionnaire was completed by the property owner or owner representatives.

1.6.1 Interview with Site Owner

Mr. Dave Judkins, the current Safety and Environmental Manager for the property owner (TTI/Hoover) was extensively questioned before, during and after the Site inspection. None of the owner's representative's responses to MSG's questioning indicated the presence of RECs at the site.

1.2.2 Interviews with Government Officials

MSG spoke with several government officials to obtain relevant information regarding the Site. Mr. Gary Cohen, Fire Safety Inspector, City of North Canton Fire Department stated that there had been

issues related to the Hoover Site many years ago, but those had been resolved, and that he was not aware of any current issues associated with the Site. Ms. Angela Glosser, Air Pollution Control Engineer, Canton Health Department, indicated that there were no issues of consequence at the Site, and that the Hoover representatives were in compliance with their report filings for both her department and the State of Ohio EPA. Mr. Randy Ruzkowski, Stark County Department of Health, Environmental Health Division stated that he was not aware of any issues related to the Hoover Site.

Finally, Mr. Bob Egan, Project Manager, USEPA Region 5 in Chicago, confirmed the status of the corrective action regarding the soil and groundwater on the Site that has been described extensively in this report. Mr. Egan has been the Project manager for the Site for about two years. He reiterated several points:

- Soils issues involving PCBs had been encountered at the Site, but they have been totally resolved by removal and replacement with clean fill;
- Chlorinated hydrocarbon contamination exists in the groundwater below the Site, but is has been determined through the risk assessment process that it is not presenting a health risk, and that it can be left in place to attenuate naturally, with ongoing monitoring;
- There is a groundwater use restriction underneath the Site and also more broadly throughout the City;
- Land Use Covenants (LUCs) are being developed for the Site by the USEPA, the State of Ohio and Hoover. These LUCs will restrict residential use for the Site and govern other future uses for the Site, and;
- Hoover officials have been very cooperative in their relationship with USEPA and Mr. Egan.

1.7 FINDINGS, OPINIONS, DEVIATIONS AND CONCLUSIONS

At the request of ORA, MSG performed a Phase I ESA in general conformance with the scope and limitations of the ASTM Standard E 1527-05 of the Site. Any exceptions to, or deletions from, this practice are described in Section 1.1.4 of this report. Information was obtained from 1) practically reviewable records which include historic aerial photographs, historic topographic maps, governmental databases, and previous environmental assessments of the site, 2) the site reconnaissance performed on July 10, 2007 and August 27, 2007, and 3) interviews with local government officials, site owner, and site occupants and environmental management familiar with the property.

This assessment revealed evidence of one on-site REC, no off-site REC, and four on-site concerns. The REC and concerns are discussed in the following paragraphs.

On-Site REC

The groundwater underlying a portion of the Site is known to be contaminated with chlorinated hydrocarbons. Risk assessments have indicated that the contamination does not pose a risk to human health or the environment. The USEPA has determined that no further remedial action is required and

that the plume can be controlled by natural attenuation. Also, the safety of on-site occupants can be protected through the implementation of Land Use Controls (Section 1.4.4.8).

MSG is concerned that the USEPA and State of Ohio EPA will look differently at this situation once a new owner and/or new use is contemplated. Also MSG is concerned about future issues regarding tort liability from the adjoining property owners whose sites are underlaid by a groundwater plume emanating from the Hoover Site. Therefore, MSG considers this groundwater issue to be a REC for the Site.

Off-Site REC

There were no off-site RECs identified for the Site.

On-Site Concerns

- ACM present primarily in floor tile, thermal insulation, counter tops, transite building siding, roofing materials, mastic, dry wall mud and window caulking. A limited survey conducted in 2000 has quantified the ACM present throughout the Site. This survey and MSGs visual inspection has confirmed that the ACM is in good condition and should not pose a considerable risk if managed properly. Hoover has implemented an asbestos operations and maintenance plan and it has used that plan in a small number of abatement procedures it has conducted. The Site is pending a sale, and it is anticipated that substantial renovation may occur. It will be important to properly handle asbestos materials during renovation or demolition activities.
- Lead-based paint is present in a number of locations throughout the buildings at the Site (Section 1.5.3.20). Like ACM the painted surfaces are in good condition and should not pose a substantial risk if managed properly.
- The 10,000 gallon abandoned fuel oil tank located in the parking lot south of the boiler building (Bldg. 2) has been tightness tested and has passed. There are no known soil or groundwater conditions associated with the tank, but there is suspicion that there is still residual liquid in the tank. Due to this uncertainty, MSG believes this tank constitutes and environmental concern for the Site.
- According to the USEPA, the Site is located in an area (Stark County) that has the probability of having above 4.0 pico-curries/cm3 of radon in indoor air (Zone 1).This level is above EPA's action level for indoor air in a residential setting. No testing has been done at the Site, but because there is a probability that the Site will be repositioned for another use, this constitutes an environmental concern.
- The Site has had almost 100 years of manufacturing using chemicals containing chlorinated hydrocarbons, metals and other hazardous chemicals. There are sumps and floor channels and many places where chemical spillage could accumulate and not be noticed. There has never been any sampling of the manufacturing floor surfaces or of the soil underlying them. Because of the long history of chemical use and because it is likely that the floor surface may be disturbed in a future renovation or demolition, MSG

believes that the possible contamination of building materials in the floor and the soil underneath it constitutes an environmental concern.

1.8 RECOMMENDATIONS

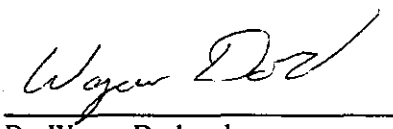
Based on the findings of this Phase I ESA, MSG recommends the following:

- MSG recommends that Hoover or a new owner/occupant utilize an asbestos management plan when conducting any building renovation or demolition. If they do so they should eliminate any risk from asbestos exposure at the Site
- MSG recommends that Hoover or a new owner/occupant also implements a lead paint management strategy for the Site. This strategy should include lead analysis of paint surfaces whenever any flaking or deterioration is observed, or if any building renovation was to occur. If paint surfaces are determined to contain lead then they should be appropriately abated prior to additional renovation work. Again, if this strategy is maintained, lead painted surfaces should present no risk for the Site.
- MSG recommends that a concrete management plan be developed for handling any concrete that is removed during renovation or demolition. Also, this plan should include a strategy for soil sampling underneath the concrete flooring if there is any evidence of contaminated soils. If contaminated soils are encountered, a subsequent soils remediation plan should be developed.
- MSG recommends that the 10,000 gallon abandoned fuel oil tank be removed at some point in the future, to eliminate the chance of future soil or groundwater contamination.
- As far as the REC involving groundwater underlying the Site is concerned, MSG recommends that the Site owner continues to be aggressive in attempting to reach absolute closure with USEPA and the State of Ohio. It may even make sense to be proactive with the neighboring property owners that have the plume underlying their properties and voluntarily conduct indoor air monitoring to assure that there is no health risk.
- Finally, MSG recommends that a new Site owner conduct a series of indoor air samples to look for the presence of radon that might be present above the residential action limit. If elevated levels are present then some type of air filtering or air displacement plan should be adopted.

2.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

The following MSG professionals certify that they participated in the Phase I ESA of the site.

Dr. Wayne Dorband and Mr. Terry Romero of MSG performed the site investigation on July 24, 2007 and wrote the report for this assessment. Dr. Dorband is the founder, President and CEO of MSG Swith an Associates of Arts (A.A.) in Liberal Arts, Bachelor of Science (B.S.) in Biology, Master of Science (M.S.) in Ecology, Doctorate of Philosophy (PhD) in Aquatic Ecology and over thirty (30) years of experience in conducting assessments. Mr. Romero has 4 years of experience working on environmental projects. Dr. Dorband wrote this assessment and Mr. Romero reviewed the report.



11-6-07

Dr. Wayne Dorband — Date

11-6-07

Terry Romero — Date

3.0 REFERENCES

The following published references were relied upon in preparing the Phase I ESA report of the site:

- American Society for Testing and Materials (ASTM). 2005. Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-05.
- Map Quest (www.mapquest.com). 2007. Address check of orphan site list.
- Appendix A – Photographs obtained during MSG site visit on July 24, 2007
- Appendix B – Dr. Dorband Bio
- Appendix C - Environmental Data Resources, Inc. (EDR). EDR Radius Map with GeoCheck
- Appendix D -Environmental Data Resources, Inc. (EDR). EDR Historical Topographic Map Report
- Appendix E -Environmental Data Resources, Inc. (EDR). EDR Aerial Photo Decade Package
- Appendix F -Environmental Data Resources, Inc. (EDR). EDR Sanborn Map

HISTORICAL RECORDS AND DOCUMENTS REVIEWED TO COMPLETE THIS ASSESSMENT

- American Analytical Laboratories. 2000. The Hoover Company, Asbestos Containing Material Building Survey, January, 2000.
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- CH2MHill. 1997. Materials and Waste Management Areas Inventory. Hoover Plant 1.
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- CH2MHill 2003a. Corrective Measures Proposal for the Hoover Company.
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- CH2MHill 2005.Annual Summary Report.2005 Monitored Natural Attenuation.
- Earth Tech, Inc. 2006. Phase I Environmental Site Assessment, Hoover Plant 1.
- WSP Environmental Strategies. 2007. Phase I Environmental Site Assessment of Hoover Company.__

Wayne R. Dorband, Ph.D.

Wayne Dorband is President and CEO of Mountain Sky Group, LLC, past Chairman of International Risk Group, LLC, and co-founder and former Chief Operating Officer of Cherokee Environmental Risk Management and Cherokee Investment Group. Dr. Dorband is considered by the industry as a leader in the area of redevelopment of environmentally impaired properties.

He has owned laboratories, consulting firms and contracting businesses as well as directed thousands of projects for private and public entities. He has taken two companies public, and has been honored with a number of entrepreneurial awards. In the late 1980's he was one of the co-founders of the Environmental Risk Insurance Company (ERIC). While at ERIC, he is known for his role in the development of the original scientific modeling used by the insurance industry to create underwriting guidelines for environmental risk and real assets. As a well-respected educator and author, Dr. Dorband is consistently sought for his broad technical expertise in a wide variety of disciplines, including air quality, soil chemistry and aquatic ecology. He began his professional career as a college professor and pioneered an environmental studies program at one of the pre-eminent liberal arts colleges in the upper-midwest, Augustana College.

He is an active board member of a variety of community service organizations, and has been an active coach and participant in elite level athletics for his entire adult life. He has four children and a wonderful wife of over 25 years, Deb. He holds an AA from Bethany Lutheran College, a BS in Biology from the University of California, Irvine, a MS in Biology from San Diego State University and a PhD in Fisheries Resources from the University of Idaho.

Over the last several years, Dr. Dorband has become an industry leader in the management of complex public/private partnerships involving federal real estate land disposition. Specifically, Dr. Dorband has directed a number of projects involving transfer of major Department of Defense (DOD) facilities through the base closure process. He is currently directing the redevelopment of several sites involving public/private partnerships with municipalities in Colorado, Wisconsin, Ohio and California.